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Attorneys for the Underwriter Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE SCHERING-PLOUGH
CORPORATION/ENHANCE
SECURITIES LITIGATION

: Civil Action No. 08-397
: (DMC)(JAD)
:
: Honorable Dennis M.
: Cavanaugh
: Oral Argument Requested
: **DECLARATION OF**
: **JEFFREY J. GREENBAUM**
:
: *Document Electronically Filed*

JEFFREY J. GREENBAUM, declares as follows:

1. I am a Member of the firm of Sils Cummis & Gross P.C.,
counsel for defendants ABN AMRO Rothschild LLC; Banc of America Securities
LLC; Banca IMI SpA; BBVA Securities Inc.; Bear, Stearns & Co. Inc. (now J.P.
Morgan Securities LLC); BNP Paribas Securities Corp.; BNY Capital Markets,
Inc.; Citigroup Global Markets, Inc.; Credit Suisse Securities (USA) LLC; Daiwa

Securities America Inc. (now Daiwa Capital Markets America Inc.); Goldman, Sachs & Co. (incorrectly identified as Goldman, Sachs & Co., Inc.); ING Financial Markets LLC; J.P. Morgan Securities Inc. (now J.P. Morgan Securities LLC); Mizuho Securities USA Inc.; Morgan Stanley & Co. Incorporated (now Morgan Stanley & Co. LLC); Santander Investment Securities Inc.; and The Williams Capital Group, L.P. (the “Underwriter Defendants”) in this action. I submit this declaration in support of the Underwriter Defendants’ Opposition to Lead Plaintiffs’ Motion for Class Certification.

2. Attached as **Exhibit A** is a true and correct copy of a document produced by Lead Plaintiff, Arkansas Teacher Retirement System (“ATRS”), which was marked as Defendants’ Exhibit 43 during the Rule 30(b)(6) deposition of ATRS on February 24, 2011.

3. Attached as **Exhibit B** is a true and correct copy of a document produced by Lead Plaintiff, ATRS, which was marked as Defendants’ Exhibit 44 during the Rule 30(b)(6) deposition of ATRS on February 24, 2011.

4. Attached as **Exhibit C** is a true and correct copy of excerpts from the transcript of the first deposition of Lead Plaintiffs’ class certification expert, Chad Coffman, dated November 15, 2011 (with highlighting by counsel to identify relevant passages).

5. Attached as **Exhibit D** is a true and correct copy of excerpts from the deposition transcript of Allianz Global Investors Capital LLC (Rule 30(b)(6) witness, Justin Kass), dated June 14, 2011 (with highlighting by counsel to identify relevant passages).

6. Attached as **Exhibit E** is a true and correct copy of excerpts from the transcript of the second deposition of Lead Plaintiffs' class certification expert, Chad Coffman, dated November 29, 2011 (with highlighting by counsel to identify relevant passages).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 6, 2011.

/s/ Jeffrey J. Greenbaum
Jeffrey J. Greenbaum